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April 10, 2024

BY ECF and Email: JMM hearings@nyeb.uscourts.govThe Honorable Jil Mazer-Marino
United States Bankruptcy Judge
Bankruptcy Court for the Eastern District of New York
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East – Suite 1595
Brooklyn, NY 11201Re: *The Ideal Supply Company v. David Rusi*
Adversary Proceeding No.: 1-23-01087-jmm

Dear Judge Mazer-Marino,

The undersigned represents Plaintiff The Ideal Supply Company in the above-referenced matter. As per the Court's January 11, 2024 Docket Entry, the Court set an April 11, 2024 deadline for fact discovery and scheduled a pre-motion conference for April 23, 2024. On April 10, 2024, Defendant's counsel represented that, subject to an ongoing search, all documents currently in Defendant's possession responsive to Plaintiff's document demands and various Lien Law s. 76 demands have been produced.

The parties conferred and jointly request that the Court extend the fact discovery deadline to May 10, 2024 to enable Plaintiff to conduct the deposition of Defendant Rusi and for Defendant to conduct the deposition of Plaintiff. The parties further jointly request that the Court adjourn the pre-trial conference currently scheduled for April 23, 2024 at 11:00 AM to May 22, 2024 at 11:00 AM, or at such other time convenient for the Court.

Thank you for Your Honor's consideration of this request.

Respectfully,



Adam A. Perlin

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